

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

MARCH 2024 GRAND JURY
(Impaneled March 22, 2024)

THE UNITED STATES OF AMERICA INDICTMENT

-vs-

NICHOLAS BLOOM

Violations:

Title 18, United States Code,
Section 2261A(2)(B)
(2 Counts)

COUNT 1

(Cyberstalking)

The Grand Jury Charges That:

Between on or about January 29, 2024, and on or about June 26, 2024, in the Western District of New York, and elsewhere, the defendant, **NICHOLAS BLOOM**, with intent to harass and cause substantial emotional distress to another person, that is Victim 1, a person known to the Grand Jury, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT 2

(Cyberstalking)

The Grand Jury Further Charges That:

Between on or about June 10, 2024, and on or about June 26, 2024, in the Western District of New York, and elsewhere, the defendant, **NICHOLAS BLOOM**, with intent to harass and cause substantial emotional distress to another person, that is Victim 2, a person known to the Grand Jury, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 2.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

DATED: Buffalo, New York, August 1, 2024.

TRINI E. ROSS
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON